

1                   John M. Naylor  
2                   Nevada Bar No. 5435  
3                   Andrew J. Sharples  
4                   Nevada Bar No. 12866  
5                   NAYLOR & BRASTER  
6                   1050 Indigo Drive, Suite 200  
7                   Las Vegas, NV 89145  
8                   (T) (702) 420-7000  
9                   (F) (702) 420-7001  
10                  jnaylor@nblawnv.com  
11                  asharples@nblawnv.com

12                  *Attorneys for Defendants Pacific Payment  
13                  Technologies d/b/a Ubiquity, Tre'lage, LLC,  
14                  Neil Haboush, Neil Sollinger, Mark Soller,  
15                  Pasha Sollinger and Nancy LaBier*

16                  **UNITED STATES DISTRICT COURT**

17                  **DISTRICT OF NEVADA**

18                  GAIA BOTANICALS, LLC,

19                  Plaintiff,

20                  v.

21                  PACIFIC PAYMENT TECHNOLOGIES,  
22                  LLC d/b/a, UBIQUITY, TRE'LAGE, LLC,  
23                  MARIN RAIN, INC., NEIL HABOUSH,  
24                  NEIL SOLLINGER, MARK SOLLER,  
25                  JAMES T. LOVERN, PASHA SOLLINGER,  
26                  NANCY E. LABIER, Does 1-50 and XYZ  
27                  Corps., 1-50,

28                  Defendants.

Case No. 2:18-cv-00789-APG-PAL

**STIPULATION FOR EXTENSION OF  
TIME FOR DEFENDANTS PACIFIC  
PAYMENT TECHNOLOGIES, LLC d/b/a,  
UBIQUITY, TRE'LAGE, LLC, NEIL  
HABOUSH, NEIL SOLLINGER, MARK  
SOLLER, PASHA SOLLINGER AND  
NANCY E. LABIER TO FILE THEIR  
REPLY IN SUPPORT OF MOTION TO  
DISMISS [ECF NO. 32]**

**(SECOND REQUEST)**

Complaint filed: May 1, 2018

21                  Plaintiff, Gaia Botanicals, LLC (“Plaintiff”), and Defendants Pacific Payment  
22                  Technologies d/b/a Ubiquity, Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha  
23                  Sollinger and Nancy LaBier (“Stipulating Defendants”), by and through their respective counsel,  
24                  file this Stipulation for Extension of Time for Stipulating Defendants to file their reply in support  
25                  of their pending Motion to Dismiss (ECF No. 32). Stipulating Defendants request an extension up  
26                  to and including October 12, 2018 to file their reply in support of the pending Motion to Dismiss.<sup>1</sup>

27                  

---

<sup>1</sup> This is the second request for an extension as the stipulation entered on August 28, 2018,  
28                  provided Stipulating Defendants with two weeks to file their reply from the date of Plaintiff's

1           This stipulation is made in good faith and will not prejudice any party. This stipulation is  
2 requested due to a personal family emergency of lead counsel for Stipulating Defendants,  
3 necessitating his travel out of state.

4           Dated this 2<sup>nd</sup> day of October 2018.

5           LIPSON NEILSON P.C.

6           NAYLOR & BRASTER

7           By: /s/ Joshua B. Katz  
8           Kaleb D. Anderson  
9           Nevada Bar No. 7582  
10           9900 Covington Cross Drive, Suite 120  
11           Las Vegas, NV 89144

12           KENT, BEATTY & GORDON, LLP

13           Joshua B. Katz (*pro hac vice*)  
14           Eleven Times Square  
15           New York, NY 10036

16           Attorneys for Plaintiff

17           By: /s/ Jennifer L. Braster  
18           John M. Naylor  
19           Nevada Bar No. 5435  
20           Jennifer L. Braster  
21           Nevada Bar No. 9982  
22           Andrew J. Sharples  
23           Nevada Bar No. 12866  
24           1050 Indigo Drive, Suite 200  
25           Las Vegas, NV 89145

26           Attorneys for Defendants Pacific Payment  
27           Technologies d/b/a Ubiquity, Tre'lage, LLC,  
28           Neil Haboush, Neil Sollinger, Mark Soller,  
          Pasha Sollinger and Nancy LaBier

16           **ORDER**

17           IT IS SO ORDERED that Defendants Pacific Payment Technologies d/b/a Ubiquity,  
18           Tre'lage, LLC, Neil Haboush, Neil Sollinger, Mark Soller, Pasha Sollinger and Nancy LaBier have  
19           up to and including October 12, 2018 to file their reply in support of the Motion to Dismiss.

20           Dated: October 2, 2018.



21           UNITED STATES DISTRICT JUDGE

22           opposition. (ECF No. 36).